

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

GREGORY TAYLOR, individually and on
behalf of all others similarly situated,

Plaintiff,
v.

THE PROCTER & GAMBLE COMPANY,

Defendant.

Case No. 3:22-cv-01949 (DWD)

**DEFENDANT THE PROCTER & GAMBLE COMPANY'S
MOTION TO DISMISS PLAINTIFF'S CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that Defendant The Procter & Gamble Company (“P&G”) hereby moves: (1) to dismiss Plaintiff's Class Action Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim on which relief can be granted; and (2) to dismiss Plaintiff's request for injunctive relief for lack of standing pursuant to Federal Rule of Civil Procedure 12(b)(1). P&G seeks dismissal with prejudice and without leave to amend.

P&G's motion is based on this motion, the accompanying Memorandum of Law, and any further evidence or argument (including oral argument) the Court may invite P&G to present in connection with this motion.

WHEREFORE, P&G respectfully requests that the Court dismiss Plaintiff's Class Action Complaint with prejudice and without leave to amend.

Dated: December 27, 2022

Respectfully submitted,

FAEGRE DRINKER
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/s/ Jeffrey S. Jacobson

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*Attorneys for Defendant
The Procter & Gamble Company*

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jeffrey S. Jacobson

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